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August 22, 2006

BY HAND DELIVERY AND E-FILE

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-31

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's responses to the following Information Requests:

USW-1-14 (SUPPLEMENTAL) USW-1-32 (SUPPLEMENTAL)

USW-1-33 (SUPPLEMENTAL)

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc: Paul Osborne (DTE)
A. John Sullivan (DTE)
Alexander Cochis, Assistant Attorney General (4 copies)
Charles Harak, Esq. (UWUA)
Nicole Horberg Decter, Esq. (USW)
Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE USW
D.T.E. 06-31

Date: August 22, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

SUPPLEMENTAL RESPONSE

USW 1-14: From January 1, 2003 to date, provide all NiSource, NCSC, and/or BSG requests for proposals to outsource work performed by BSG and other NiSource affiliate employees.

RESPONSE: Objection. The portion of this question relating to non-jurisdictional companies seeks information irrelevant to this proceeding, where Bay State's service quality on behalf of its customers and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Moreover, the question is a fishing expedition into the affairs of non-jurisdictional companies since it requests information regarding entities that have no demonstrated effect on Bay State service to its customers.

Notwithstanding this objection, but rather specifically maintaining it, Attachment USW-1-14 CONFIDENTIAL is the Request for Proposal for Administrative Services ("RFP") that was issued to three potential bidders in February 2005. The RFP constitutes confidential and proprietary business information. Accordingly, the material is provided in single copy to the Hearing Officer under a Motion for Protective Treatment and will be provided to any other party upon execution of a mutually-agreeable confidentiality agreement.

Bay State is in the process of researching the RFPs issued for work provided on its behalf by third party vendors and will supplement this response when its compilation of such material is completed.

**SUPPLEMENTAL
RESPONSE:**

Please see SUPPLEMENTAL Attachment USW-1-14 for a list of Bay State-related projects where an RFP was issued for work provided on its behalf by third party vendors between January 1, 2003 and July 31, 2006. Given the number of RFP invitees and the sensitive nature of each RFP response, the Company will make available for viewing upon request and at Bay State's Westborough headquarters, and under confidential treatment, any specific RFP responses identified in SUPPLEMENTAL Attachment USW-1-14.

**Bay State Gas Company
Projects / Purchases Related To Bay State Gas
Where an RFP Was Issued
January 1, 2003 - June 30, 2006**

RFP #	Sourcing/Project Event(s)	Location	RFP Date	# Suppliers Invited	Service Authorization #	Date	Term	Reported By
MA-8205-BSG	Blanket Construction	Brockton, Springfield, Lawrence Divisions	1/8/2004	7	6047188 RH White	4/1/2004	2 Years	S. Patton
					6047189 Universal			
					6047190 Powershot			
					6047192 NEUCO			
BSG2006-SPFLD-1	Memorial Drive Replacement Project	Springfield Division	3/23/2006	6	6060581	5/1/2006	1 Year	S. Patton
BSG2006-SPFLD-2	Wilbraham Rd Replacement Project	Springfield Division	3/23/2006	6	6060581	5/1/2006	1 Year	S. Patton
BSG2006-SPFLD-3	State St Replacement Project	Springfield Division	4/11/2006	9	6060581	5/1/2006	1 Year	S. Patton
BSG2006-BRK-1	Main St Norwell Replacement Project	Brockton Division	2/22/2006	6	6060384	5/1/2006	1 Year	S. Patton
BSG2006-BRK-2	Medway Replacement Project	Brockton Division	2/22/2006	6	6060385	5/1/2006	1 Year	S. Patton
BSG2006-BRK-3	Main St Medway Replacement Project	Brockton Division	2/22/2006	6	6060386	5/1/2006	1 Year	S. Patton
BSG2006-BRK-4	Norton Replacement Project	Brockton Division	2/22/2006	6	6060387	5/1/2006	1 Year	S. Patton
	Wyeth Pharmaceutical Installation	Lawrence Division	2/27/2004	5	6048244	6/1/2004	1 Year	S. Patton
	West Springfield Uprate	Springfield Division			6047188			S. Patton
	Somerset Ave Taunton	Brockton Division						S. Patton
BSG-2005-SP	Bare Steel Blanket Replacement Construction	Brockton Division	2/7/2005	5	6053278, 6053279	3/14/2005	1 Year	S. Patton
BSG2006-3-19	Contingent Labor Lawrence	Lawrence Division	3/19/2006	5	6060234	4/1/2006	1 Year	S. Patton
BSG-LA-0305	Bare Steel Replacement	Lawrence Division	3/18/2005	7	6054323	5/2/2005	1 Year	S. Patton
BSG 2005 SPFLD	Memorial Drive Segment 1	Springfield Division	3/3/2005	7	6053975	5/9/2005	1 Year	S. Patton
	Memorial Drive Segment 2	Springfield Division	3/3/2005	7	6053975	5/9/2005	1 Year	S. Patton
	Ryan Road	Springfield Division	3/3/2005	7	6047188	5/9/2005	1 Year	S. Patton
BSG 040323	Keyhole Services	Brockton, Springfield, Lawrence Divisions	3/23/2004	5	6047192	3/8/2004	3 years	S. Patton
ERL020206	Laboratory Services	NiSource- includes BSG	2/2/2006	9	LAB-041406-ACC	4/16/2006	2 Years	S. Patton
					LAB-041406-LAN			
					LAB-041406-STL			
	Boiler Program	Brockton, Springfield, Lawrence Divisions	9/12/2003	3	6045812-001	12/1/2003	1 year	L Archibald
DLB HS 111805	Medical screening, data management & program management	NiSource- includes BSG	11/18/2005	6	NCS060303-01	3/3/2006	3 Years	B Potters
DLB TS 111805	Safety Related Training Services	NiSource- includes BSG		6	NCS060202-01	1/1/2006	3 Years	B Potters
WBM 122805	Waste Stream Management	NiSource- includes BSG	12/28/2005	6	NCS060506-01	5/6/2006	2.5 Years	B Potters
	Contingent Labor	NiSource- includes BSG			7025	12/6/2005	3 Years	B Potters

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Date: August 22, 2006

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As to Objection: Legal Counsel

SUPPLEMENTAL RESPONSE

USW 1-32: For each year beginning January 1, 1999 to the present date, provide the number of trunk lines that BSG utilized to take customer service, billing, and credit calls at its Springfield Call Center.

RESPONSE: Objection. The request constitutes a fishing expedition. Materials dating to 1999 are completely irrelevant to this inquiry that takes place in 2006, when Bay State has met its call center service quality metrics for over three years. Bay State has met or exceeded its call center metrics in each of the years 2003, 2004 and 2005. The request is not calculated to lead to evidence that will be admissible as to any material issue in this proceeding.

Notwithstanding this objection, but rather specifically maintaining it, Bay State will state that it is gathering the information regarding trunk lines for the referenced activities for 2003 through 2006 and will supplement this information when the information has been compiled.

**SUPPLEMENTAL
RESPONSE:**

As testified to in D.T.E. 05-27, Mr. Bryant is aware, based on conversations with Company employees, that some time during the period between 1999 and his arrival at Bay State in 2001, a supervisor then employed made the determination to limit the number of calls entering the Springfield Contact Center queues (e.g., reduce trunk line capacity). It is also Mr. Bryant's understanding that this decision was undertaken to reduce customer hold times once a customer entered the credit, billing or service queue during a very difficult transition to a new customer information system (CIS). Mr. Bryant does not believe that this decision was undertaken as an effort by NiSource management to cut expenses or reduce customer service. In fact, the decisions to both deploy additional trunk lines and to make the available telephone capacity more efficient at the Springfield Contact Center in the period since January 2002 followed the implementation of a new NiSource-wide centralized call center management team.

Mr. Bryant has been unable to identify the exact number of Springfield Contact Center trunk lines that were in place either before or immediately following his arrival at the Company. He was also unable to locate any other type of documentation regarding the decision to limit the number of calls hitting the Company's queues during the 1999 - 2001 period.

However, the Company has been able to locate trunk line capacity records showing both a progressive increase in trunk line capacity during the 2002 period as well as the current trunk line capacity. Although the current trunk line capacity has been reduced between July 2002 and the present, the Company upgraded its telephone switch in January 2003. This enhancement, which resulted in the sharing of capacity among the three queues (as opposed to the old "channelization" approach), combined with the movement toward a universal customer service representative model has resulted in a more efficient call center operation.

Please see SUPPLEMENTAL Attachment USW-1-32 for the available trunk line capacity data.

**Bay State Gas and Northern Utilities
Springfield Contact Center
Trunk Line Capacity**

Line No.			1/1/2002	2/1/2002	4/1/2002	5/1/2002	7/1/2002	Current 2/
	Credit							
1	800 #	MA	10	10	16	20	22	
2	800 #	ME/NH	4	8	8	8	8	
3	Local		6	6	6	6	7	
4	Subtotal		<u>20</u>	<u>24</u>	<u>30</u>	<u>34</u>	<u>37</u>	
5								
6	Billing							
7	800 #	MA	20	20	20	24	26	1/
8	800 #	ME/NH	11	11	11	11	12	
9	Local		<u>11</u>	<u>11</u>	<u>11</u>	<u>11</u>	<u>12</u>	
10	Subtotal		<u>31</u>	<u>31</u>	<u>31</u>	<u>35</u>	<u>38</u>	
11								
12	Service							
13	800 #	MA	20	20	20	24	26	1/
14	800 #	ME/NH	12	12	12	12	14	
15	Local		<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>14</u>	
16	Subtotal		<u>32</u>	<u>32</u>	<u>32</u>	<u>36</u>	<u>40</u>	
17								
18	Total		83	87	93	105	115	94

NOTES: 1/ The shaded area reflects shared capacity among the three jurisdictions.

2/ The current configuration reflects the new, more efficient shared telephone switch configuration.

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As to Objection: Legal Counsel

SUPPLEMENTAL RESPONSE

USW 1-33: From December 1999 to date, provide all documents in the possession, custody, or control of NiSource, NCSC, or BSG regarding or relating to whether the number of trunk lines utilized by BSG's Springfield Call Center should be, or were, lowered, or conversely, increased.

RESPONSE: Objection. The request constitutes a fishing expedition. Materials dating to 1999 are completely irrelevant to this inquiry that takes place in 2006, when Bay State has met its call center service quality metrics for over three years. Bay State has met or exceeded its call center metrics in each of the years 2003, 2004 and 2005. The request is not calculated to lead to evidence that will be admissible as to any material issue in this proceeding.

Notwithstanding this objection but rather specifically maintaining it, Bay State will state that it is looking to determine whether any such documents exist from the years 2003, 2004, 2005 or 2006 and will supplement this response if any such material is found.

**SUPPLEMENTAL
RESPONSE:**

Please see the Company's SUPPLEMENTAL RESPONSE to USW 1-32 for additional information related to this question.